## **EXHIBIT 9**



May 21, 2024

Michael R. White (michaelrwhite@comcast.net) Our File #24174/0000

Federal ID No.: 52-1123287

Re: Billing History Statement

Matter	Date	Type	Bill	Amount	Balance	Comment
0	11/5/2021	Retainer		5,000.00	0.00	Deposit
0	12/03/2021	Bill	141084	18146.91	0.00	From bill
						#141084
0	01/07/2022	Bill	141559	5813.31	0.00	From bill
						#141559
0	02/02/2022	Bill	142046	7667.37	0.00	From bill
						#142046
0	03/04/2022	Bill	142541	210.00	0.00	From bill
						#142541
0	04/04/2022	Bill	143038	105.00	0.00	From bill
						#143038
0	05/06/2022	Bill	143858	0.00	0.00	From bill
						#143858
0	06/06/2022	Bill	144116	0.00	0.00	From bill
						#144116
0	08/10/2022	Bill	145267	246.00	0.00	From bill
						#145267
0	09/07/2022	Bill	145634	175.00	0.00	From bill
						#145634
0	12/06/2022	Bill	147007	315.00	0.00	From bill
						#147007
0	01/10/2023	Bill	147515	455.00	0.00	From bill
						#147515
0	04/07/2023	Bill	148885	245.00	0.00	From bill
						#148885
0	06/02/2023	Bill	149834	35.00	0.00	From bill
						#149834
0	07/12/2023	Bill	150815	665.00	0.00	From bill
						#150815
0	08/04/2023	Bill	150942	176.94	0.00	From bill
						#150942
						word more at 150 to 1

1173. In so doing, it is clear that the Court implicitly found that Helms, a non-party, had standing to prosecute the *Rule 11* motion.

Compass and their counsel have violated Rule 11 and Compass' counsel have violated the prohibitions in 28 U.S.C. § 1927 by vexatiously² filing and continuing to prosecute claims against Movant that have no basis in fact - and were instead designed specifically to embarrass and oppress Movant, expose Movant to undue burden and expense, discourage Movant from participating in this instant matter, and penalize Movant for reporting Compass and their counsel to law enforcement and participating in the subsequent federal investigation concerning the sale of securities. Movant identified these improper strategies and motives for the actions of Compass and their counsel when they first tried to drag Movant into this case, and repeatedly attempted to discourage Compass and their counsel from pursuing them at the outset of this litigation. (ECF 031, 033, 036, 042 and 044). Movant has been required to expend substantial time and resources and incur significant attorney fees and costs to defend against these outrageous claims. Movant's attorney fees directly related to the defense of these continuing malicious claims are \$44,237.97 – so far. Under these circumstances, where Compass and their counsel took actions in bad faith and for an improper purpose, finding good cause to grant Movant standing and the imposition of sanctions are appropriate.

## INTRODUCTION

Compass is a Virginia Corporation that was headquartered in Maryland. The owners of Compass are Daniel White ("Daniel"), Michael White ("Michael"), and John White ("John")<sup>3</sup>. John and his counsel sometimes pretend that John is the "CEO" of Compass, but he is not.

At the outset of this litigation, Compass and their counsel filed a Motion for Civil Contempt Sanctions on a Nonparty (ECF 063), improperly seeking to have the Court hold Movant in contempt, sought punitive damages payable to Compass and counsel, and literally asked this Court to incarcerate Movant. After a full day deposing Movant, Compass and their counsel filed a Motion to Compel and Extend the Number of Deposition Hours of Nonparties against Movant. (ECF 081). The Court referred those motions to United States Magistrate Judge

<sup>&</sup>lt;sup>2</sup> Behavior is "vexatious" when it is harassing or annoying, regardless of whether it is intended to be so. Vexatious means that the actions were 'frivolous, unreasonable, or without foundation, even though not brought in subjective bad faith. *Christiansburg Garment Co. v. EEOC*, 434 U.S. 412, 421, 98 S.Ct. 694, 54 L.Ed.2d 648 (1978).

<sup>&</sup>lt;sup>3</sup> A review of the records of the Virginia State Corporation Commission indicates that John has during this litigation in a musical chairs fashion given himself various corporate roles including "CEO", Executive Chairman, Chairman, President, Director, sole Director, etc. During this litigation, John and his counsel also presented Todd Mitchell and Larry McWilliams as "co-CEO" and "CEO" of Compass, and numerous parties as "President" and "Directors". John is not the "CEO", the "Executive Chairman", or "the majority shareholder" of Compass - nor any of the other disguises he assigns himself. John did not "terminate" Daniel or Michael, nor did he have the authority to terminate them.

Michael R. White Billing History Statement May 21, 2024 Page 2

0	09/06/2023	Bill	151424	175.00	0.00	From bill #151424
0	10/04/2023	Bill	151991	280.00	0.00	From bill
0	11/06/2023	Bill	152568	1190.00	0.00	#151991 From bill #152568
0	12/06/2023	Bill	153109	257.44	0.00	From bill #153109
0	01/04/2024	Bill	153578	70.00	70.00	From bill
0	02/05/2024	Bill	154166	140.00	140.00	#153578 From bill
0	03/04/2024	Bill	154675	2415.00	2415.00	#154166 From bill
0	04/03/2024	Bill	155213	175.00	175.00	#154675 From bill
0	05/06/2024	Bill	155695	280.00	280.00	#155213 From bill #155695